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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SCOTT FRIEDMAN, an individual,)
Plaintiff,)
v.)
UNITED STATES OF AMERICA;)
GENE M. TIERNEY, individually and)
in his official capacity as an FBI Agent;)
MATTHEW A. ZITO, individually and)
in his official capacity as an FBI Agent;)
THAYNE A. LARSON, individually and)
in his official capacity as an FBI Agent;)
LAS VEGAS METROPOLITAN)
POLICE DEPARTMENT; JOE LEPORE,)
P#6260, individually and in his official)
capacity as an officer of the LAS VEGAS)
METROPOLITAN POLICE)
DEPARTMENT; DARREN HEINER,)
P#2609, individually and in his official)
capacity as an officer of the LAS VEGAS)
METROPOLITAN POLICE)
DEPARTMENT; JASON HAHN, P#3371,)
Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO THE OBJECTIONS
TO THE REPORT AND
RECOMMENDATION FILED BY THE
FEDERAL AGENT DEFENDANTS
(Docket No. 94) (First Request)**

1 individually and in his official capacity)
2 as an officer of the LAS VEGAS)
3 METROPOLITAN POLICE)
4 DEPARTMENT; Tali Arik, an individual;)
5 Julie Bolton, an individual; and Arik)
6 Ventures, an entity formed by Tali Arik,)
Defendants.)

)

7 IT IS HEREBY STIPULATED and AGREED by and between Defendants GENE
8 TIERNEY, MATTHEW ZITO and THAYNE LARSON, by and through their counsel AUSA
9 GREG ADDINGTON, and Plaintiff SCOTT FRIEDMAN, by and through his counsel,
10 MELANIE A. HILL and LISA A. RASMUSSEN, that the deadline to respond to the Objections
11 to the Magistrate's Report and Recommendation (ECF No. 94), be extended to Wednesday,
12 October 24, 2018. This Stipulation is executed for the following reasons:

- 13 1. Tierney, Zito and Larson (collectively the federal agent defendants) filed their
14 Objections to the Magistrate's Court's Report and Recommendation on October 5,
15 2018. (ECF 94.)
- 16 2. The deadline to respond to the Objections is today's date.
- 17 3. Ms. Hill was working on the Response because Ms. Rasmussen has the following
18 other deadlines today:
 - 19 a. A Memorandum in Support of Motion for Certificate of Appealability due in
20 the Ninth Circuit. United States v. Darell Conners, docket no. 18-16259.
 - 21 b. A Response to a Motion to Dismiss in Maldonado v. Brian Williams, case
22 number 14-cr-1484 APG.
 - 23 c. A Motion for Bail Pending Appeal, United States v. Ganesh, 5:16-cr-211
24 LJK (USDC NDCA, San Jose).
- 25 4. Ms. Hill's best friend lost her mother this week and Ms. Hill is traveling to
26 California today for the memorial service.

1 5. Ms. Rasmussen will be traveling to Reno on Monday, returning early Tuesday.
2 Therefore Plaintiff's counsel has requested that they be permitted to file their
3 response on Wednesday, October 24, 2018.

- 4 6. Counsel for the federal agents, Greg Addington, is not opposed to the extension.
5 7. The request for additional time in this Stipulation is made in good faith.
6 8. The requested extension is not for purposes of delay.

7 Dated this 19th day of October, 2018.

8 Respectfully submitted by,
9

10 DAYLE ELIESON
11 UNITED STATES ATTORNEY

12 By: /s/ Greg Addington
13 GREG ADDINGTON, AUSA
14 Nevada Bar No. 6875
15 Attorney for Zito, Tierney &
16 Larson

17 LAW OFFICE OF LISA RASMUSSEN, P.C.

18 By: /s/ Lisa A. Rasmussen
19 LISA A. RASMUSSEN
20 Nevada Bar No. 7491
21 Attorney for Plaintiff Scott Friedman

ORDER

This matter came before the Court on the parties' Stipulation and Order to Extend the Deadline for Plaintiff to Respond to the Objections to the Report and Recommendation filed by the Federal Law Enforcement Agent Defendants, Tierney, Zito and Larson. Based on the stipulation of the parties, and finding that the extension request is made in good faith and not for the purposes of undue delay,

IT IS HEREBY ORDERED that the deadline for Plaintiff to file a response to the Objections filed by Tierney, Zito and Larson (ECF 94) is extended to October 24, 2018.

Dated: October 24, 2018.

**JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE**